

Mathew K. Higbee, Esq., SBN 42755
HIGBEE & ASSOCIATES
1504 Brookhollow Dr., Suite 112
Santa Ana, CA 92705
(714) 617-8352
(714) 597-6729 facsimile
Email: mhigbee@higbeeassociates.com

Attorney for Plaintiff,
MICHEL KECK,

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

MICHEL KECK, an individual,

Plaintiff,

v.

LITB INC. d/b/a www.lightinthebox.com, a
Washington corporation; and, DOES 1 through 50
inclusive,

Defendants.

Case No. 2:17-cv-01671-JLR

**MOTION AND ~~PROPOSED~~ ORDER TO
EXTEND TIME TO FILE ANSWER OR
OTHER RESPONSIVE MOTION**

1 WHEREAS, Plaintiff Michel Keck ("Plaintiff") filed its complaint on November 7, 2017
2 naming as defendants LITB INC. d/b/a www.lightinthebox.com and DOES 1 through 50
3 (collectively "Defendants") (D.I. 1);

4 WHEREAS, pursuant to this Court's previous Order (Dkt. #6), the time for Defendants to
5 answer or otherwise move in response to the complaint is February 9, 2018;

6 WHEREAS, counsel for Plaintiff has been in communication with counsel for
7 Defendants to discuss settlement and the parties have agreed to an additional extension of time
8 for Defendants to answer or otherwise respond to the complaint for 30 days in light of these
9 discussions;

10 WHEREAS, counsel for Plaintiff does not intend to agree to any additional extensions;

11 NOW, THEREFORE, pursuant to the parties' agreement, Plaintiff respectfully moves the
12 Court to extend the time for the Defendants to answer or otherwise move in response to the
13 complaint to March 12, 2018.

14 DATED: February 7, 2017

HIGBEE & ASSOCIATES

15
16 By: /s/ Mathew K. Higbee

17 Mathew K. Higbee, Esq.,
18 Washington Bar No. 42755
1504 Brookhollow Dr., Suite 112
19 Santa Ana, CA 92705
(714) 617-8352
20 (714) 597-6729 facsimile
Email: mhigbee@higbeeassociates.com
21 *Counsel for Plaintiff*
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

IT IS SO ORDERED that the deadline for the Defendants to answer or otherwise move in response to Plaintiff's complaint shall be March 12, 2018. *No further extensions will*

be granted. JLR

DATED: 11 Feb., 2018


JAMES L. ROBERT
DISTRICT JUDGE

PROOF OF SERVICE

I am employed in the County of Orange, State of California; I am over the age of 18 and not a party to the within action; my business address is 1504 Brookhollow Dr., Ste 112, Santa Ana, California, 92705

On February 7, 2018, I served the foregoing document(s) described as:

**MOTION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE
ANSWER OR OTHER RESPONSIVE MOTION**

X (BY EMAIL) I caused such documents to be delivered via electronic mail to the email addresses for counsel as follows:

Harrison "Buzz" Frahn <hfrahn@stblaw.com>

Michael H. Joshi <Michael.Joshi@stblaw.com>

Counsel for Defendant LITB Inc.

(BY MAIL) I deposited such envelope in the mail at Santa Ana, California. The envelope was mailed with postage thereon fully prepaid and addressed to the person below:

(BY PERSONAL SERVICE) by causing a true and correct copy of the above documents to be hand delivered in sealed envelope(s) with all fees fully paid to the person(s) at the address(es) set forth below:

(BY EXPRESS MAIL) I deposited such envelope on the parties in said action via FEDEX STANDARD OVERNIGHT by placing a copy in a sealed envelope, postage pre-paid and depositing in a FedEx box at Santa Ana, California to the person(s) below:

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on February 7, 2018, at Santa Ana, California.

/s/ Ryan E. Carreon

Ryan E. Carreon